

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**FILED**

JUN 13 2011 *aw*  
JUN 13 2011  
MICHAEL W. DOBBINS  
CLERK, U. S. DISTRICT COURT

Ronald Harris  
Plaintiff.

v.

Thomas J. Dart, et al.

Case no. 10 C 6666

Judge: John W. Darrah  
Magistrate Judge: Morton  
Denlow

Motion For The  
Appointment Of Counsel

Now Comes the Plaintiff, Ronald Harris, pro-se pursuant to 28 U.S.C. sec. 1915 (e)(1) and move for and order to appoint counsel to represent him in the above captioned matter. In support of this motion the Plaintiff states the following;

1. The Plaintiff declare that he is unable to afford the service of an attorney.

2. Plaintiff has been incarcerated since 2001 and is in all respects indigent.

3. Plaintiff has no high-school education and do not posses the skills as an professional attorney.

4. Plaintiff had/has a couple of "Jail-houes Lawyers" who aided him in the preperation and completion of his complaint, and don't know when he or they might be moved, leave the unit, or be transferred to another facility.

5. That the Plaintiff is housed in a Protective Custody unit in Pontiac Correctional Center and is only allowed access to the Law Library once a week, if any access at all.

6. Plaintiff has several severe medical problems, that hinders his mobility. (i.e. a clot in his leg and severe gout)

7. Plaintiff is not free to leave on his own word in order to investigate, take deposition(s) of witness or travel to the Cook County Jail to speak to officers involved in this complaint, without some form of retaliation towards him.

8. Upon information and belief, Plaintiff will soon transfer back to other correctional center, where he will have to be without his legal boxes for at least 2 to 3 weeks if not longer.

9. The issues involved in this case are complex, not limited to the Plaintiff having limited knowledge of the law.

10. Plaintiff have made the following attempts to retain counsel to represent him in this most worthy matter and have attached those returned letters as exhibits to this motion.

11. Plaintiff has been previously represented by an attorney appointed to him by this court in Harris v. Bell, 02 C4690

**WHEREFORE**, the Plaintiff prays that this Honorable Court grant his motion and appoint counsel to represent him in this most worthy cause.



Dated: ~~June 12~~ 7, 2011

Ronald Harris

Reg: R58741

Pontiac Correctional Center

700 W. Lincoln St, Box 99

Pontiac, IL 61764

## LOEVY & LOEVY

ATTORNEYS AT LAW

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Michael Kanovitz  
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October 6, 2010

### CONFIDENTIAL LEGAL CORRESPONDENCE

Ronald Harris  
R-58741  
Stateville Correctional Center  
PO Box 112  
Joliet, IL 60434

*Re: Your request for legal representation*

Dear Mr. Harris:

This letter is to inform you that after reviewing your file, we are unfortunately unable to take your case.

Please be advised that there are time limitations that govern the period in which a claim or lawsuit may be filed. Such time periods depend on the cause of action you may wish to pursue. We encourage you to follow up with other attorneys immediately to ensure that all legal rights are fully explored and protected.

We appreciate your decision to contact us, and wish you the best of luck in pursuing your claims.

Sincerely,



Anne Gottschalk

# centerforconstitutionalrights

666 broadway new york, ny 10012  
212.614.6464 www.ccr-ny.org

Dear Friend,

Thank you for your letter. The Center for Constitutional Rights is a non-profit legal and educational organization dedicated to advancing and protecting the rights guaranteed by the United States Constitution and the Universal Declaration of Human Rights. Most of our cases are large class-action law suits designed to challenge government or corporate misconduct that affects large numbers of people.

Although we can't represent you, we are happy to be able to provide you with the enclosed Jailhouse Lawyer's Handbook to aid you in case you decide to file a law suit yourself, challenging your treatment. We hope that you find it to be both a solid, informative resource, and an accessible introduction on filing Section 1983 suits, your constitutional rights in prison, and legal research in general. It is a free publication, to be copied and shared with fellow prisoners, family members and friends. Knowledge is power, and we hope you let others know about the Handbook. If you know people on the outside who are interested in obtaining a copy, they can download one from [www.jailhouselaw.org](http://www.jailhouselaw.org) or [www.ccr-ny.org](http://www.ccr-ny.org).

As you start reading the handbook, please pay special attention to pages 36 and 37, in chapter A. These sections lay out very important information about statutes of limitation and exhaustion of the prison grievance system – if you don't comply with these requirements, you may lose your chance to sue about unfair treatment. Good Luck!

Sincerely,

Center for Constitutional Rights



**WINSTON  
& STRAWN  
LLP**

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**Electronic Letterhead**

WRITER'S DIRECT DIAL  
312-558-6206  
wberry@winston.com

**PRIVILEGED & CONFIDENTIAL**

February 22, 2011

**VIA U.S. MAIL**

Ronald Harris R58741  
Pontiac Correctional Center  
700 W. Lincoln Avenue, Box 99  
Pontiac, IL 61764

**Re: Request for Pro Bono Assistance**

Dear Mr. Harris:

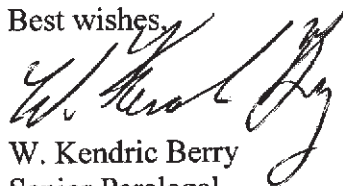
We recently received your request for legal assistance.

Winston & Strawn receives many requests from throughout the country seeking assistance. Although we cannot grant every request, we are dedicated to our communities, and we make every effort to provide legal services to persons in need.

We have thoroughly reviewed your submission and enclosures. Unfortunately, at this time, we will not be able to grant your request for assistance. This denial should not be viewed as a decision regarding the merits of your cause. Such determinations are properly made within our courts and judiciary.

Winston & Strawn remains committed to our traditions of client service, professional development, and community involvement. We wish you the best of luck in your future endeavors.

Best wishes,



W. Kendric Berry  
Senior Paralegal

## LOEVY & LOEVY

ATTORNEYS AT LAW

Jon Loevy  
Michael Kanovitz  
Russell Ainsworth  
Mark Loevy-Reyes  
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Website: [www.loevy.com](http://www.loevy.com)  
Email [loevylaw@loevy.com](mailto:loevylaw@loevy.com)

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April 15, 2011

### CONFIDENTIAL LEGAL CORRESPONDENCE

Ronald Harris  
R58741  
Pontiac Correctional Center  
700 W. Lincoln St.  
Pontiac, IL 61764

*Re: Your request for legal representation*

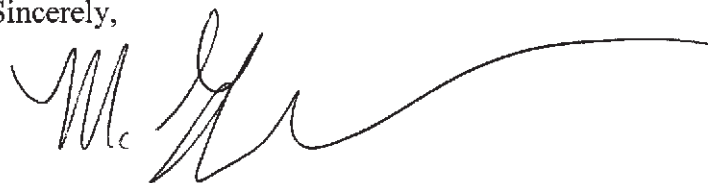
Dear: Ronald Harris

This letter is to inform you that after reviewing your file, we are unfortunately unable to take your case.

Please be advised that there are time limitations that govern the period in which a claim or lawsuit may be filed. Such time periods depend on the cause of action you may wish to pursue. We encourage you to follow up with other attorneys immediately to ensure that all legal rights are fully explored and protected.

We appreciate your decision to contact us, and wish you the best of luck in pursuing your claims.

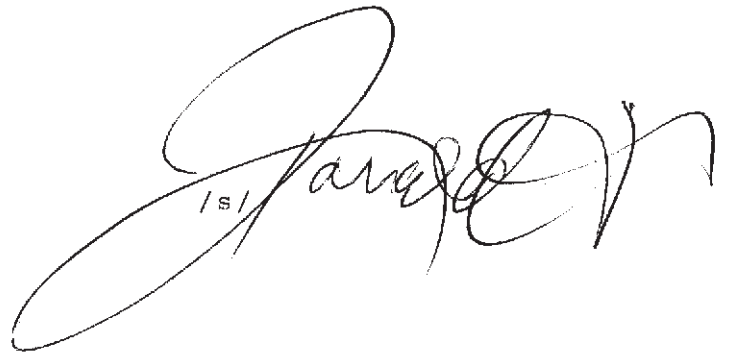
Sincerely,

A handwritten signature in black ink, appearing to read 'Maddy Gabor', with a long, sweeping horizontal line extending to the right.

Maddy Gabor

**CERTIFICATE OF SERVICE**

I, Ronald Harris, Plaintiff in the above captioned matter, hereby certify that the attached notice of filing and the above mentioned document was served upon the person named above on June 8, 2011 by depositing a copy of the foregoing in the U.S. Mail at the Pontiac Correctional Center, Pontiac, IL 61764.

A handwritten signature in black ink, appearing to read "Ronald Harris", with a large, stylized flourish extending from the end. The signature is written over the printed name "Ronald Harris" which is faintly visible in the background.